

1 Meredith E. Marcus
2 *PRO HAC VICE Counsel*
Attorney at Law: 6303890 (Illinois)
3 Daley Disability Law, P.C.
4 4256 N. Ravenswood Ave., Suite 104
Chicago, Illinois 60613
Tel.: (312) 561-3030
5 Fax: (312) 284-4773
E-mail: mmarcus@fdaleylaw.com
6 One of the Attorneys for Plaintiff,
Gerald L. Reeves

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8 **UNITED STATES DISTRICT COURT**
FOR THE DISTRICT OF NEVADA
9 **LAS VEGAS DIVISION**

10 Gerald L. Reeves,) **Case No.: 2:18-cv-01174-GMN-EJY**
11)
Plaintiff,)
12)
vs.)
13)
Andrew M. Saul,)
14 Commissioner of Social Security,)
Defendant.)
15)

16 **STIPULATION FOR AN AWARD OF ATTORNEY'S FEES**
17 **UNDER THE EQUAL ACCESS TO JUSTICE ACT**

18 Plaintiff and Defendant, by their respective counsel, stipulate to an award to Plaintiff of
19 attorney fees in the amount of \$7,200.00 in full satisfaction and settlement of any and all claims
20 Plaintiff may have under the Equal Access to Justice Act ("EAJA") in the above case. The award
21 of attorney fees will satisfy all of Plaintiff's claims for fees, costs, and expenses under 28 U.S.C.
22 § 2412 in this case.

23 The parties request that the order provide that any fees paid belong to Plaintiff — not
24 Plaintiff's attorney — and can be offset to satisfy pre-existing debt that Plaintiff owes the United
25 States. *See Astrue v. Ratliff*, 560 U.S. 586 (2010). Plaintiff has provided Defendant with a valid
26 assignment of fees. If Defendant can verify that Plaintiff does not owe pre-existing debt subject

1 to offset, Defendant will direct payment of the award to Plaintiff's attorney pursuant to the EAJA
2 assignment.

3 WHEREFORE, the parties request that the Court enter an order awarding Plaintiff
4 attorney fees in the sum of \$7,200.00 in settlement of any and all claims Plaintiff may have in the
5 matter pursuant to the EAJA.

6
7 /s/ Meredith E. Marcus
Meredith E. Marcus
8 Attorney for Plaintiff
Daley Disability Law, P.C.
9 4256 N. Ravenswood Ave., Suite 104
Chicago, IL 60613
10 Phone: (312) 561-3030
Fax: (312) 284-4773
11 Email: mmarcus@fdaleylaw.com

Nicholas A. Trutanich
United States Attorney


By: /s/ Michael K. Marriott¹
Michael K. Marriott
Assistant Regional Counsel
Social Security Administration
Office of the General Counsel, Region IX
160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: 415-977-8985
Facsimile: 415-744-0134
Email: Michael.Marriott@ssa.gov

26 ¹ Signed with permission given by Assistant Regional Counsel on June 26, 2020.

Gerald L. Reeves,)	Case No.: 2:18-cv-01174-GMN-EJY
)	
Plaintiff,)	
)	
vs.)	
)	
Andrew M. Saul,)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	

Pursuant to the parties' stipulation, the Court awards Plaintiff attorney fees in the amount of \$7,200.00 in full satisfaction and settlement of any and all claims Plaintiff may have under the Equal Access to Justice Act (EAJA) in this case. The award of attorney fees will satisfy all of Plaintiff's claims for fees, costs, and expenses under 28 U.S.C. § 2412 in this case. Any fees paid belong to Plaintiff and not her attorney and can be offset to satisfy pre-existing debt that the litigant owes the United States under *Astrue v. Ratliff*, 130 S. Ct. 2521 (2010). If counsel for the parties can verify that Plaintiff owes no pre-existing debt subject to offset, Defendant agrees to direct that the award be made payable to Plaintiff's attorney pursuant to the EAJA assignment duly signed by Plaintiff and counsel.

Dated this 29 day of June, 2020.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT